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November 6, 2023

VIA ECF


United States District Court
Southern District of New York
Attn: Hon. Jennifer L. Rochon, U.S.D.J.
500 Pearl Street, Courtroom 20B
New York, New York 10007-1312

The requested extension is GRANTED. The
deadline for filing Objections to the Report and
Recommendation is now **November 13, 2023**.

Dated: November 6, 2023
New York, New York

**Re: Gilberto Trinidad, Jeremy Fernandez and Nicolas De Jesus
Herrera Sanchez v. 62 Realty, LLC, et al.
Case No: 22-cv-101 (JLR) (GWG)**

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

Dear Judge Rochon:

This office represents Defendants in the above-referenced case. Defendants, together with Plaintiffs, write to request an extension of the time period for filing and serving objections to the Report and Recommendation, dated October 17, 2023 (the "Report and Recommendation") (Dkt. # 123), of Hon. Gabriel W. Gorenstein, United States Magistrate Judge, regarding Plaintiffs' motion for attorney's fees and costs.

Pursuant to 28 U.S.C. § 636(b)(1)(c) and Rule 72 of the Federal Rules of Civil Procedure (hereinafter referred to as "Rules" or "Rule"), a party has fourteen (14) days from service of a report and recommendation to file written objections. See 28 U.S.C. § 636(b)(1)(c) & Fed. R. Civ. P. 72. A party may also seek an extension of time of the deadline set forth in Rule 72. See Gao v. Perfect Team Corp., No. 10-CIV.-1637 (ENV) (CLP), 2013 WL 6901136, at *1 n. 1 (E.D.N.Y. Dec. 31, 2013) (extending Rule 72 deadline upon request). Pursuant to Rule 6, the court may, for good cause, extend the time with or without motion or notice if a request is made before the original time or its extension expires. See Fed. R. Civ. P. 6(b)(1)(A).

The parties respectfully submit that good cause exists warranting an extension of time as the parties have reduced their settlement of the attorney's fees to a written settlement agreement, and are optimistic that they will reach a resolution. Therefore, the parties request that the November 6, 2023 deadline for filing Objections to the Report and Recommendation be extended for an additional week to November 13, 2023. This is the second request for an extension of this deadline.

The parties appreciate the Court's consideration of this request.

Dated: Lake Success, New York
November 6, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

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